



ETHICALLY SPEAKING

VOLUME 7, ISSUE 2

APRIL 2022

A Message from the Director

INSIDE THIS ISSUE:

Director's Message	1
Upcoming Events	1
New and Notable	2
Enforcement Updates	2
Ethics in the News	3
More Ethics in the News	3
In the Mirror	3
Ask BEGA	4

The Office of Government Ethics' has launched its new Learning Management System (LMS). The LMS will assist OGE in providing ethics training to the District's more than 34,000 employees and public officials. The LMS will serve as a central location for on-demand ethics training and training materials.

District employees and public officials will have access to trainings that address a range of ethics issues such as Becoming an Ethical Leader, Receiving Gifts, Developing an Ethical Culture, Ethical Decision Making, the Role of the Ethics and Compliance Program, as well as training on the specific District ethics rules on gifts, conflicts of interests, outside employment, financial disclosures, and nepotism.

The LMS will supplement our live monthly trainings and agency-specific trainings. Users will have the ability to keep track of their completed ethics trainings using



Ashley D. Cooks
Director of Government Ethics

the transcript feature, which is essential for financial disclosure statement filers.

Employees can access the LMS using this URL - <https://bega-console.lrn.com/>. Registration is required before creating a

username and password.

We want to thank our beta testers for helping to refine the LMS so that it can serve as a resource to promote an ethical government in the District.

As always, we are here to assist you along your ethics journey!

Upcoming Events

Lobbyist Activity Reports due
April 18, 2022

Financial Disclosure Statements due
May 16, 2022

General Ethics Training

May 11, 2022 - 1:00 pm

June 8, 2022 - 1:00 pm
Sign up here:
[Ethics Training](#)

Hatch Act Training

May 3, 2022 - 1:00 pm
June 7, 2022 - 1:00 pm

Sign up here:
[Hatch Act Training](#)

Ethics Counselor Brown Bag

April 25, 2022 - 1:00 pm
Learning Management System

May 23, 2022 - 1:00 pm
Nepotism

New and Notable

Job Announcements

BEGA is seeking a qualified candidate to fill its Chief of Staff vacancy. This position serves as BEGA's office manager and oversees all of BEGA's day-to-day administrative activities and operations. The incumbent operates under the direction of BEGA's Directors and coordinates and has knowledge of priority and routine issues within BEGA's operations. This includes serving as the legislative liaison for the Directors with the D.C. Council when needed; representing the Directors and BEGA in meetings with the D.C. City Administrator; and coor-

ordinating BEGA's administrative and policy reporting. A full description of the vacancy announcement is available on [Careers DC](#).

Financial Disclosure

It's Financial Disclosure Season here at BEGA. Disclosure of an employee's financial interests allows your agency to screen for potential conflicts of interest. If you are a District employee who is required to file a Public or Confidential Financial Disclosure Statement, you should receive notice of your filing obligation by April 15th and you should file your statement by **Monday, May 16, 2022**. If you have questions about whether you are a filer, check out the Ask BEGA section of this newsletter or contact your ethics counselor or BEGA for guidance.



Personal use of
official resources is
prohibited

Enforcement Updates

21-0046-P C. Witt

Respondent violated DPM § 1808.1 by using government property for other than authorized purposes when he engaged in personal use of District owned or leased vehicles without authorization and when he used these vehicles outside his tour of duty. Respondent agreed to pay a \$4,500 fine. Read more [here](#).

22-0002-F N. Albert

Respondent failed to recuse himself from voting to approve qualifications for six bidders for contracts with the District of Columbia Housing Authority (DCHA) when he served as Chairperson of the DCHA

Board of Commissioners, including a company owned by a person he was closely affiliated with in violation of D.C. Official Code § 1-1162.23(a). Respondent separately violated D.C. Official Code § 1-1162.23 (a) by signing the resolution to approve the list of qualified bidders and violated D.C. Official Code § 1-1162.23(c)(2) by failing to make a full disclosure of the relationship and the resulting financial interest prior to voting on and approving the resolution. Respondent agreed to pay a \$15,000 fine and to attend a full OGE ethics training within six months in the event he is employed by the District government in the future. Read more [here](#).

21-0076-P J. Nelson

Respondent failed to act impartially and not give preferential treatment to any individual or organization in violation of DPM § 1800.3(b) when she processed Supplemental Nutrition Assistance Program (SNAP) benefits for two individuals she knew personally while employed at the Department of Human Services (DHS) causing the individuals to receive benefits sooner than others who applied. Respondent violated DPM § 1808.1, when she accessed the DHS system to process the SNAP applications. Respondent agreed to pay a \$500 fine and attend ethics training. Read more [here](#).

Ethics in the News



Just because you are no longer employed by the government does not mean that your obligations under the ethics rules are at an end. As Omarosa Manigault Newman, a former official in the admin-

istration of President Donald Trump, learned, the obligations you have as a government employee continue even after your last day on the job. Manigault Newman was recently ordered to pay a \$61,585 penalty for failing to file a termination financial disclosure report after she was fired from her position with the White House. Under the Ethics in Government Act (EIGA), Manigault Newman was required to file a termination report within 30 days of the termination of her employment. Manigault Newman did

not file her termination report for more than a year after her departure from the White House and only filed after the government initiated the suit against her. The government sought a civil penalty for Manigault Newman's knowing and willful violation of EIGA and the judge awarded the inflation-adjusted statutory maximum civil penalty at the time of the government's motion for summary judgment. Read more about the case [here](#). The decision is available [here](#).

More Ethics in the News

A Former Congressional Staffer hired as the Director of Operations for a Member of Congress was responsible for managing the office budget for payroll and bonus payments for all employees. Between 2019 and January 2021, the Staffer submitted fraudulent paperwork authorizing salary increases or bonuses for himself. The Department of Justice's press release regarding

this issue can be found [here](#).

The Staffer was terminated, pleaded guilty, and now faces up to ten years in prison. D.C. Government employees may use this lapse in ethical judgment as a reminder that not only should you work with integrity, that there may be grave consequences if you fail to do so. Not only would something like this damage the public trust, it also

affects a person's personal reputation... reputations that take years to build, and moments to destroy. The DPM § 1800.3 obligates D.C. Government employees to place loyalty to the laws and ethical principals above private gain, adhere to state, federal, and local laws, and to avoid the appearance of violating the law or ethical standards.

Inside the Mirror

The most important ingredient in making good choices is self-reflection. Our logic in nuanced and quickly made choices are often flawed for a host of reasons. With that being said, taking a moment to critique your choices, the do's versus don'ts, the nice versus mean, or choosing the wellbeing of others versus the wellness of yourself is needed to make better choices

when faced with similar circumstances in the future. The first step is to identify your principals. Defining the type of person you want to live as guides your decision making. The second is identifying how you want to be treated. The effects of self-reflection are just that, reflective. Not many people will choose for others to treat them poorly or make decisions that do not consid-

er their comfort. More often than not, treating others how you want to be treated, will persuade them to treat you in the same manner. Lastly, remember to recall prior outcomes before you act, and always try to make the good choice.





Board of Ethics and Government Accountability

Office of Government Ethics
441 4th Street, NW
Suite 830 South
Washington, DC 20001
Phone: 202-481-3411
Email: bega@dc.gov
Website: bega.dc.gov

Ashley D. Cooks, Director of Government Ethics
Rashee Raj, General Counsel
Asia Stewart-Mitchell, Supervisory Attorney for Advice and Education
Maurice Echols, Attorney Advisor
Millicent Jones, Attorney Advisor
Lynn Tran, Senior Attorney Advisor to BEGA's Board

For more information about BEGA you can find us at:



To subscribe to this newsletter, email us at bega@dc.gov.

Ask BEGA

Question: What is a Financial Disclosure Statement and do I need to file one?

A Financial Disclosure Statement (FDS) is a publicly available record containing financial and professional information about the filer and his or her spouse for a calendar year.

There are two types of FDS filers: Public and Confidential. The primary distinction between public and confidential filers is salary. A public filer has a salary at or above the rate of Excepted Service 9 (\$115,160) while a Confidential Filer has a salary below Excepted Service 9.

The D.C. Official Code defines filers as any employee or elected official who advises, makes decisions or participates substantially in areas of contracting, procurement, admin-

istration of grants or subsidies, developing policies, land-use planning, inspecting, licensing, policy-making, regulating, or auditing, or acts in areas of responsibility that may create a conflict of interest or appearance of a conflict of interest, as determined by the appropriate agency head. If your duties are encompassed within the definition above, you will be designated as a filer by your agency.

Public officials and employees designated by their agencies must file an FDS. Failure to file will result in monetary fines of up to \$300 against the filer. Any challenges to your designation as a FDS filer must be made with

your agency.

Employees and public officials are required to file FDS forms by answering all questions in the form, except ANC filers, who only complete the certification section.

FDS Filers, other than Councilmembers, must file by May 15th of each year and report the activity for the previous calendar year. Councilmembers file on May 15th and November 15th of each year. This year FDS reports are due on May 16, 2022 since May 15th falls on a weekend.

You can find more information about the FDS filing requirements and resources under the [Financial Disclosure](#) menu on BEGA's website. Also view our video: [Ms. Ethics in the Morning - Financial Disclosure](#).

